Message

From: Praskins, Wayne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4F47BC0A2C2E42A98347D59CD1A98B19-WPRASKIN]
Sent: 12/28/2020 2:47:05 AM
To: Walker, Stuart [Walker.Stuart@epa.gov]
Subject: FW: Hunters Point Buildings Radiological Rework
Attachments: Hunters Pt Navy BPRG response 12.11.20.pdf; 2020-12-22_EPAResponseToNavyBuildingRGLetter_Signed.pdf

Importance: High

From: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
Sent: Wednesday, December 23, 2020 1:07 PM
To: Stalcup, Dana <Stalcup.Dana@epa.gov>; Gervais, Gregory <Gervais.Gregory@epa.gov>
Cc: Leff, Karin <Leff.Karin@epa.gov>; Lowery, Brigid <Lowery.Brigid@epa.gov>; Libelo, Laurence <Libelo.Laurence@epa.gov>; Azad, Ava <Azad.Ava@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>
Subject: Hunters Point Buildings Radiological Rework
Importance: High

Dana and Greg,

I'm writing to update you on our efforts at the Hunters Point Naval Shipyard site (HPNS) to come to agreement with the Navy on the protectiveness of the radiological building remedial goals (RGs) included in the site RODs. Last year the Navy proposed to use RESRAD BUILD (RRB) in lieu of EPA's BPRG calculator to support their protectiveness determinations. That initiated our radiological consultation with EPA HQ. Following that consultation, in August 2020, Region 9 relayed EPA's concerns to the Navy regarding the use of RRB, emphasizing that through our review/consultation we were unable to concur with the Navy's conclusion that the Hunters Point radiological building remedial goals are protective under CERCLA. We proposed a path forward using the BPRG calculator which would greatly lower some of the remedial goals.

The Navy sent a letter to the Region on December 11 (attached) and we responded yesterday (attached). The Navy continues to oppose the use of the BPRG calculator, claiming that EPA's proposed BPRG values for removable contamination (i.e., dust) are below background and too low to detect with state-of-the-art equipment. The Navy again requested that EPA support the Navy's RRB analysis, describing RRB as "refined, complete, and appropriate" and the "most extensively tested, verified, and validated tool used for … radiological risk assessment."

We agree with the Navy that the BPRG calculator, when used with default inputs, generates conservative risk estimates and conservative remediation goals. For the radionuclides of concern at HPNS, the BPRG calculator estimates risks several orders of magnitude higher than RRB. We have worked with the Navy, unsuccessfully, to determine whether less conservative site-specific inputs are appropriate which would generate lower risk estimates and higher remedial goals. We have also worked with the Navy to try to resolve our concerns about their use of RRB at Hunters Point. Those efforts have also, to date, been unsuccessful.

Here's where we need your assistance in helping us prepare for further discussions and/or a formal dispute with the Navy: Given the BPRG calculator is a national tool, we need to continue close coordination with your offices as we work to resolve our differences with the Navy to ensure your interests in the BPRG calculator are represented. There are three issues that we already know we need your support with, so are elevating them to you now:

1) It would be helpful to know of other Superfund cleanup examples where remediation goals have been set to address radiologically-contaminated buildings for residential use (whether using BPRG, RRB, or another risk model).

2) We do not have a clear sense of how many times the BPRG calculator has been used to provide cleanup values at NPL sites, and the circumstances in which it has been used (e.g., radionuclides, target risk, RGs, building use). We are especially interested in examples where the planned use was residential.

3) We expect that one of the primary topics of discussion in a dispute will be the level of conservatism designed into the RRB and BPRG calculators for removable radiological contamination (i.e., dust) and the much higher risks estimated by the BPRG calculator. The BPRG calculator estimates risk by multiplying a contaminant concentration by four exposure factors. We encourage you to be prepared to explain the basis for the default values for these four factors, the use of the product of the four factors to estimate risk, and examples where HQ has supported site-specific modifications to the calculator to estimate risk from radiologically contaminated dust.

Thanks for your support. Let's see if we can schedule a discussion the week of January 4th hopefully when all return from well-deserved breaks.

Happy Holidays!!!

Enrique